

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Juan Pablo NUNEZ-Calixto (67)

Celaya, Guanajuato, Mexico

Case No.

L-21-MJ-_____

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 10, 2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

18 USC 1001

Offense Description

Whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully—

- (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;
- (2) makes any materially false, fictitious, or fraudulent statement or representation; or
- (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry.

This criminal complaint is based on these facts:

On or about October 10, 2021, at approximately 1:30 am, defendant, Juan Pablo NUNEZ-Calixto, a citizen and national of Mexico, applied for admission into the United States at the Juarez Lincoln Port of Entry in Laredo, Texas, as a passenger in a commercial bus. At primary inspection, defendant presented a Lawful Permanent Resident Alien Card (Form I-551) bearing the name and photograph of C.E.Z. to primary CBP Officer Jose Bonilla. CBPO Bonilla asked the defendant if he was the true owner of the document presented and the defendant stated that he was. CBP systems indicated a photo mismatch on the person presenting the lawful permanent resident card and referred defendant to secondary for further inspection. In secondary inspection, defendant admitted to CBPO Dominique Underwood the person on the card was not him. During a pat-down for officer safety, the defendant was found in possession of a Mexican Voter's Registration Card bearing his photograph and true name as Juan Pablo NUNEZ-Calixto. Defendant identified himself as a citizen and national of Mexico born in Celaya, Guanajuato, Mexico with no legal status to enter or remain in the United States. Facts are based on the defendant's sworn statement & records of Customs & Border Protection. The defendant was paroled into the United States and an Immigration hold has been placed.

☐ Continued on the attached sheet.

/s/ Cynthia C. O'Bryant

Complainant's signature

Cynthia C. O'Bryant, CBP Enforcement Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: October 12, 2021

Judge's signature

City and state: Laredo, Texas

Christopher Dos Santos, U.S. Magistrate Judge

Printed name and title